REMARKS

I. Status of the Claims

The Applicants have carefully considered the Office Action dated May 30, 2008, and the references it cites. In the Office Action, the Examiner rejects:

- claims 1-3 and 6-8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,639,915 to Tsztoo et al. (*Tsztoo*) in view of U.S. Patent No. 6,639,915 to Kuehnel et al. (*Keuhnel*); and

- claims 4-5 and 9-10 as being unpatentable over *Tsztoo* in view of Kuehnel and in further view of U.S. Patent No. 6,201,789 to Witkowski et al. (*Witkowski*).

II. Claim Rejections Under 35 U.S.C. § 103(a)

Tstzoo describes a content accessible memory that includes a data bus for carrying voice data, an address bus for carrying the header information, and a control bus to selectively control access to the voice data and header information. *See Tsztoo at col. 5-6.* To simplify accessing the voice data, the system of *Tsztoo* preferably stores the data packets in a contiguous memory that is easily addressable by a base address. *See Tsztoo at FIG. 7.* In particular, *Tsztoo* generates CHANNEL# values to further generate base addresses corresponding to the different voice channels, thereby not requiring the storing all of the multiplexed voice data. *See Tsztoo at col. 8, ll. 35-51.* Preferably, *Tsztoo* divides the contiguous memory into non-contiguous portions. *See Tsztoo at col. 10, ll. 17-23.*

The Applicants respectfully submit that *Tsztoo* does not describe a buffer memory for storing symbol data for the logical channel according to input sequences and, further, *Tsztoo* does not describe storing the symbol data in the buffer in a continuous arrangement. First of all, *Tsztoo* describes that the time periods of the data packets "are arbitrary and can be of different lengths." *See Tsztoo at col. 9, ll. 50.* That is, as illustrated by FIG. 7 of *Tsztoo*, the data lengths of the packets can vary. Thus, *Tsztoo* is focused on a solution to easily sort data packets by non-contiguous memory blocks as illustrated in FIG. 7. By making non-contiguous portions, the system of *Tsztoo* can easily select the data packet by multiplexing

rather than the burdensome process of examining each packet. Thus, the memory described in *Tsztoo* is non-contiguous and does not meet the recitation of claim 1, which describes storing the symbol data for the logical channel according to input sequences so that the symbol data between logical channels are continuously arrayed.

In addition, although the data packets of *Tsztoo* do contain data therein, the data packets also include header information. As a result, the data of *Tsztoo* are in a discontinuous arrangement because the data for the different voice channels are separated by header information. And, as described above and as is clearly illustrated in FIG. 7 of *Tsztoo*, the data packets can be non-contiguous with each other. Therefore, the descriptions of *Tsztoo* that the Office Action relies upon is in contrast with the language of claim 1, which sets forth that a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data between logical channels are continuously arrayed.

Moreover, the Examiner that *Tsztoo* describes a buffer memory for storing the symbol data for the logical channel according to input sequences. It appears that the Examiner contends the Voice Packet Buffer Memory (VPBM) of *Tsztoo* constitutes a buffer memory. However, *Tsztoo* discloses that:

> In a VPBM write operation, the VPBM 934 can receive voice and/or accompanying data according to a channel number. In a VPBM read operation, the VPBM 938 can provide voice and/or accompanying data according to channel number and/or a group value.

See Tsztoo at 15:51-55. However, this description of *Tsztoo* is not analogous to claim 1, which recites a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data between logical channels are continuously arrayed.

The Examiner also alleges that the "input CHANNEL_ADD" of *Tsztoo* is analogous to the input sequence as recited in claim 1. However, *Tsztoo* notes that the CHANNEL_ADD is for indicating where voice data is to be stored in the VPWM 934. *See Tsztoo at 16:30-32.* Such a description is not analogous to claim 1, which recites a buffer memory for storing the symbol data for the logical channel according to input sequences so that the symbol data between logical channels are continuously arrayed.

The Examiner also alleges that *Tsztoo* describes a start address table. In particular, the Examiner contends that the channel address memory 922 described in *Tsztoo* is analogous

to the start address table of claim 1. However, the Channel address memory of *Tsztoo* fails to disclose the recitations of claim 1. Specifically, *Tsztoo* describes that, in a VPBM write operation, the VPBM receives voice and/or accompanying data according to a channel number, and in a VPBM read operation, the VPBM provides voice and/or accompanying data according to channel number and/or a group value. *See Tsztoo at col. 15, FIG. 9.* This description of *Tsztoo* does not correspond to claim 1, which recites a start address table for storing address information according to the logical channels, each of the address information indicating a location of initial symbol data corresponding to each of the logical channels from among the symbol data stored in the buffer memory. Stated differently, *Tsztoo* does not describe the address information indicating a location of initial symbol data corresponding to each of the logical channels. Further, *Tsztoo* does not describe the start address table for storing address information according to the logical channels.

Further, symbol data has a particular meaning to those having ordinary skill in the art, which is in contrast to the data described in *Tsztoo*. Although the pending claims are to be given their broadest reasonable interpretation, "[t]he broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach." *See MPEP § 2111.* In this case, the Office Action contends that symbol data is voice data, presumably the data payloads described in *Tsztoo*. However, there is no description in *Tsztoo*, either implicit or explicit, that there is any symbol data contained therein. In particular, symbol data has a specific meaning in the art and is not just any data. Therefore, because a person having skill in the art will readily appreciate what a symbol data is, the Office Action's interpretation of claim 1 is clearly unreasonable. For at least these reasons, *Tstzoo* does not describe, either implicitly or explicitly, symbol data as recited in claim 1.

None of the cited prior art, either alone or in combination, cure the above noted deficiencies of *Tsztoo*. Thus, for at least the foregoing reasons, claim 1 and all claims depending therefrom are in condition for allowance and notice to that effect is respectfully requested. Independent claim 7 and all claims depending therefrom are also patentable for at least the same reasons discussed above in association with claim 1.

III. Conclusion

Based on at least the foregoing, the Applicants submit that the foregoing remarks are fully responsive to the Office action and request withdrawal of all rejections. Further, the Applicants respectfully submit that the claims are in condition for allowance and notice to that effect is respectfully requested. If the Examiner is of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is encouraged to contact the undersigned at the number identified below.

Respectfully submitted,

Simon Booth
Attorney of Record
Reg. No. 58,582

Roylance, Abrams, Berdo & Goodman, L.L.P.
1300 19th Street, N.W., Suite 600
Washington, D.C. 20036-2680
(202) 659-9076

Dated: August 29, 2008